FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER

EXHIBIT B

EXHIBIT B

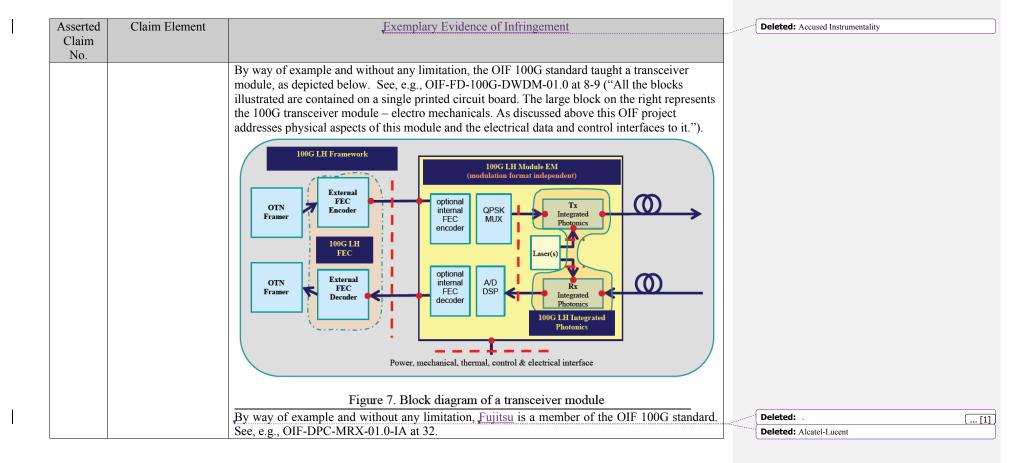
Infringement of U.S. 8,374,511 by Fujitsu

Fujitsu Network Communications ("Fujitsu") infringed one or more claims of U.S. 8,374,511 by selling and offering for sale the Fujitsu 100G OIF 168pin Coherent Transceiver (FIM85200), 100G CFP DCO Transceiver (FIM38000/100); FIM38100/100), 100G/200G CFP2 ACO Transceiver (FIM38500; FIM38100), 100G CFP Transceiver (FIM37101; FIM37102; FIM37102), 100G CFP2 Transceiver (FIM37301; FIM37302; FIM37401; FIM37402), 100G QSFP28 Transceiver (FIM37700; FIM37800), 100G/400G LN Modulator (FTM7992HM; FTM7990HKA; FTM7977HQA), 100G/400G Integrated Coherent Receiver (FIM24901; FIM24721), HD62 OTN Switch Aggregator Unit, TM61 OTU4 OTN Transponder Demarcation Unit, and Flashwave 7420 WDM Platform products, as well as the compatible chassis in which they are installed, and other products operating in a substantially similar manner such as, for example, the Flashwave 9500 Platform product and all compatible components and chassis, and the 1Finity Platform product and all compatible components and chassis. (the "Accused Instrumentalities").

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		
1	[pre] A method for	Fujitsu infringed Claim 1, and the claims discussed herein that directly or indirectly depend on
	operating an optical	Claim 1, by making, selling, using, offering for sale, and/or causing to be used the Accused
	fiber multiplexor	Instrumentalities.
	comprising:	
		To the extent that the preamble is considered to be a limitation, the Accused Instrumentalities comprise devices that practice a method for operating an optical fiber multiplexor.
		For example:
		the Fujitsu 1100G OIF 168pin Coherent Transceiver (FIM85200) is a transceiver card with a transmitting and receiving interface for DP-QPSK data. (100G OIF 168pin Coherent
		Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-
		modules/100gtrx/index.html);
		the Fujitsu 100G CFP DCO Transceiver (FIM38000/100; FIM38100/100) is a transceiver card
		with a transmitting and receiving interface for DP-QPSK data. (100G CFP DCO Transceiver
		Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp-dco/);

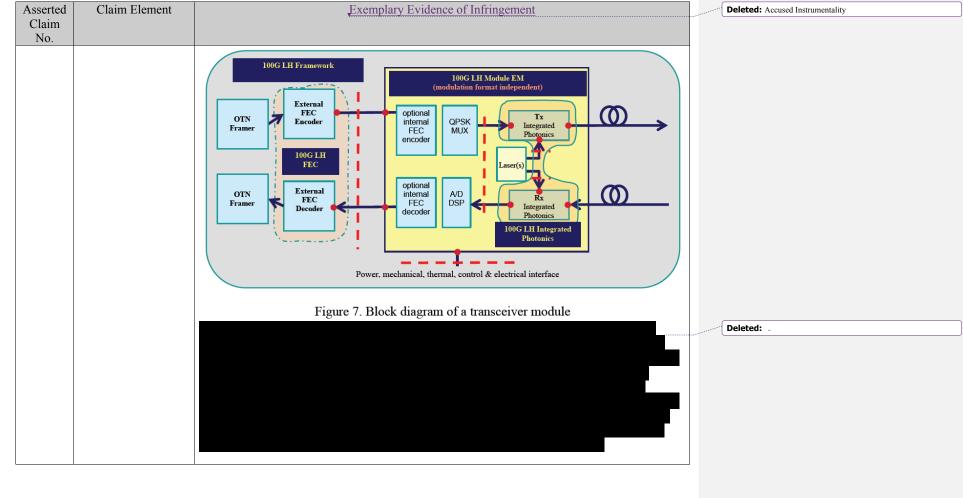
Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 3 of 49 PageID #: 3271

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim No.		
		the Fujitsu 100G/200G CFP2 ACO Transceiver (FIM38500; FIM38100) is a transceiver card with a transmitting and receiving interface for DP-QPSK data. (100G/200G CFP2 ACO Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp2-aco/); the Fujitsu 100G CFP Transceiver (FIM37101; FIM37102; FIM37201; FIM37102) is a transceiver card with a transmitting and receiving interface for DP-QPSK data (100G CFP Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gcfp/); the Fujitsu 100G CFP2 Transceiver (FIM37301; FIM37302; FIM37401; FIM37402) is a transceiver ard with a transmitting and receiving interface for DP-QPSK data (100G CFP2 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gcfp2/); the Fujitsu 100G QSFP28 Transceiver (FIM37700; FIM37800) is a transceiver card with a transmitting and receiving interface for DP-QPSK data (100G QSFP28 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100g-qsfp28/); the Fujitsu 100G/400G LN Modulator (FTM7992HM; FTM7990HKA; FTM797HQA) is a transceiver card with a transmitting and receiving interface for DP-QPSK data (100G Optical Devices Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#In-100g); the Fujitsu 100G/400G Integrated Coherent Receiver (FIM24901; FIM24721) is a component of a transceiver with receiving interface for DP-QPSK data (100G QSFP28 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#In-100g); the Fujitsu 100G/400G Integrated Coherent Receiver (FIM24901; FIM24721) is a component of a transceiver with receiving interface for DP-QPSK data (100G QSFP28 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#In-100g); the Fujitsu HD62 OTN Switch Aggregator Unit is a transceiver card with a transmitting and receiving interface for DP-QPSK data (Flashwave CDS Data Sheet); the Fujitsu TM61 OTU4 OTN Transponder Dem



Asserted	Claim Element	Ex	emplary Evidence of Infringen	<u>ient</u>
Claim				
No.				
		12 Appendix C: List o	f companies belonging	to the OIF at approval
		date		
		Acacia Communications	Fujikura	NeoPhotonics
		ADVA Optical Networking	Fujitsu	NTT Corporation
		Alcatel-Lucent	Furukawa Electric Japan	Oclaro
		Altera	Google	Orange
		AMCC	Hewlett Packard	PacketPhotonics
		Amphenol Corp.	Hitachi	PETRA
		Analog Devices	Huawei Technologies	Picometrix
		Anritsu	IBM Corporation	PMC Sierra
		Applied Communication Sciences	Infinera	QLogic Corporation
		Avago Technologies Inc.	Inphi	Qorvo
		Broadcom	Intel	Ranovus
		Brocade	Ixia	Rockley Photonics
		BRPhotonics	JDSU	Samtec Inc.
		BTI Systems	Juniper Networks	Semtech
		China Telecom	Kaiam	Spirent Communications
		Ciena Corporation	Kandou	Sumitomo Electric Industries
		Cisco Systems	KDDI R&D Laboratories	Sumitomo Osaka Cement
		ClariPhy Communications	Keysight Technologies, Inc.	TE Connectivity
		Coriant R&G GmbH	LeCroy	Tektronix
		CPqD	Luxtera	TELUS Communications, Inc.
		Deutsche Telekom	M/A-COM Technology Solutions	TeraXion
		Dove Networking Solutions	Mellanox Technologies	Texas Instruments
		EMC Corp	Microsemi Inc.	Time Warner Cable
		Emcore	Microsoft Corporation	US Conec
		Ericsson	Mitsubishi Electric Corporation	Verizon
		ETRI	Molex	Xilinx
		FCI USA LLC	MoSys, Inc.	Yamaichi Electronics Ltd.
		Fiberhome Technologies Group	MultiPhy Ltd	ZTE Corporation
		Finisar Corporation	NEC	

Asserted Claim No.	Claim Element	Exemplary Evidence of Infringement
	[a] feeding input data to a controller of a transmitter of a telecommunications box, the telecommunications box having an electronic data input for the input data and an electronic data output;	The Accused Instrumentalities feed input data to a controller of a transmitter of a telecommunications box, the telecommunications box having an electronic data input for the input data and an electronic data output. By way of example and without any limitation, the OIF 100G standard taught that the "signal [framed incoming data] then passes to the transceiver module. Data is converted to drive signals to control the optical modulators. A transmit laser provides the light source for the modulators. On the receive side the incoming signal is mixed with a local oscillator, demodulated into components, detected, amplified, digitized, then passed into the DSP module." OIF-FD-100G-DWDM-01.0 at 9 (see figure below).

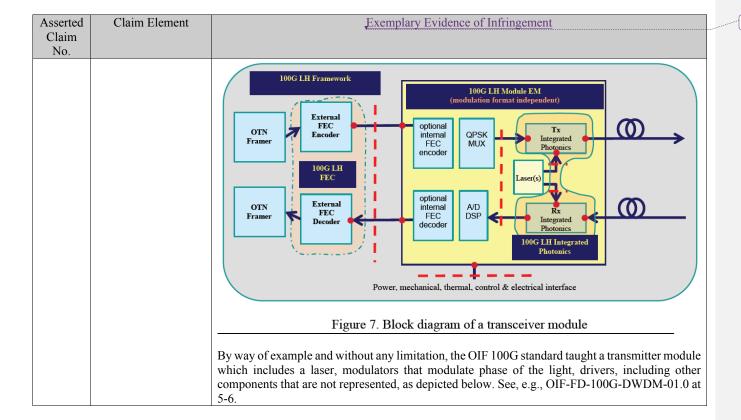


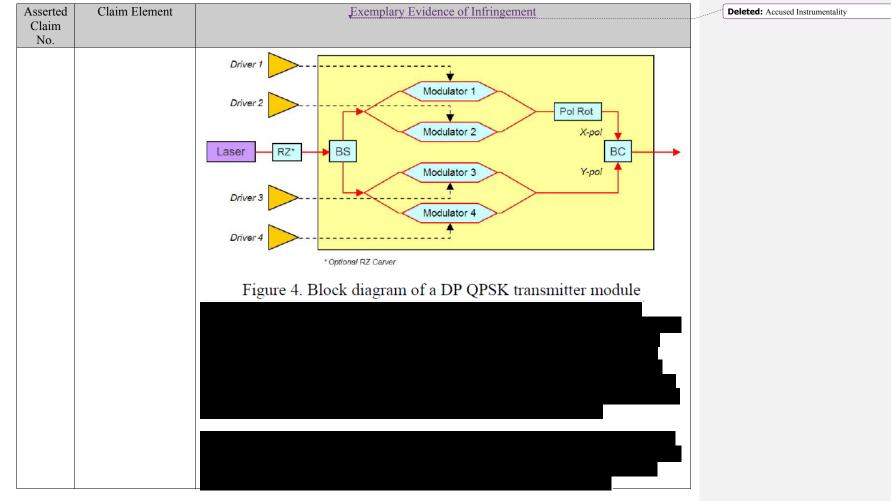
Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 8 of 49 PageID #: 3276

Asserted	Claim Element	Exemplary Evidence of Infringement	Deleted: Accused Instrumentality
Claim No.			

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 9 of 49 PageID #: 3277

Asserted Claim No.	Claim Element	Exemplary Evidence of Infringement
	[b] using the controller, controlling a modulator to	The Accused Instrumentalities use the controller to control a modulator to modulate light from a laser as a function of the input data.
	modulate light from a laser as a function of the input data;	By way of example and without any limitation, the OIF 100G standard taught that the "signal [framed incoming data] then passes to the transceiver module. Data is converted to drive signals to control the optical modulators. A transmit laser provides the light source for the modulators. On the receive side the incoming signal is mixed with a local oscillator, demodulated into components, detected, amplified, digitized, then passed into the DSP module." OIF-FD-100G-
		DWDM-01.0 at 9 (see figure below).





Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 12 of 49 PageID #: 3280

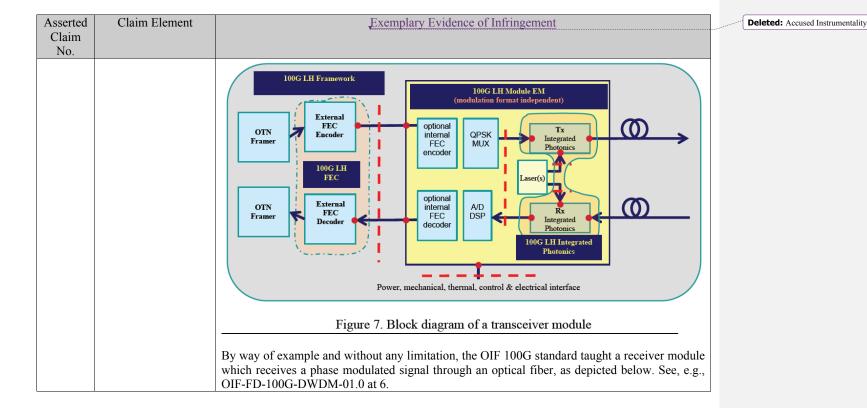
Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		
	[c] sending the	The Accused Instrumentalities send modulated light as an optical signal from the transmitter
	modulated light as an	over an optical fiber. The Accused Instrumentalities include a fiber output optically connected to
	optical signal from	an optical fiber to the card. By way of example and without any limitation, the Accused
	the transmitter over	Instrumentalities include an optical fiber interface (100G OIF 168pin Coherent Transceiver
	an optical fiber;	Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-
		modules/100gtrx/index.html);
		100G/200G CFP2 ACO Transceiver Product Page,
		http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp2-aco/; 100G CFP Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-
		modules/100gcfp/;
		100G CFP2 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-
		modules/100gcfp2/;
		100G QSFP28 Transceiver Product Page,
		http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100g-qsfp28/;
		100G Optical Devices Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-
		devices/#ln-100g);
		100G QSFP28 Transceiver Product Page,
		http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-100g;
		Flashwave CDS Data Sheet; Flashwave 7420 Data Sheet)
		Plasification (1420 Data SHEEL)

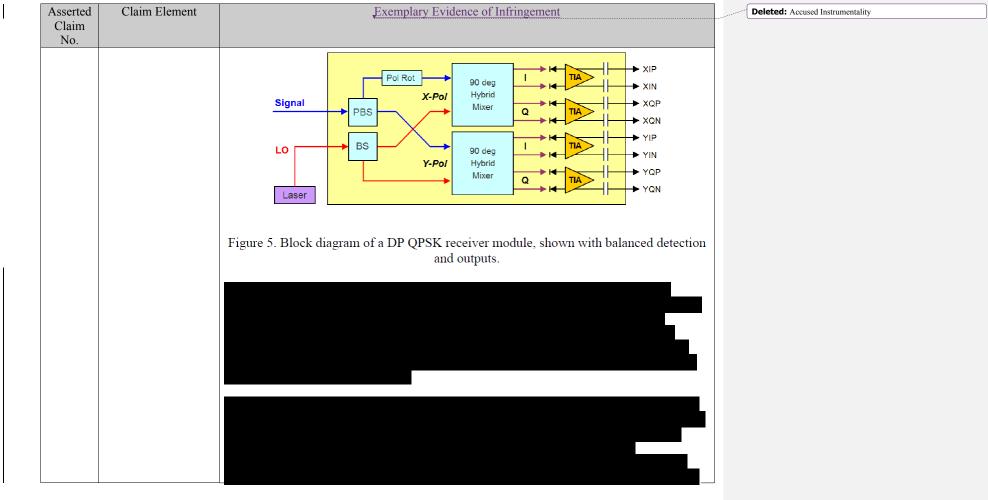
Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 13 of 49 PageID #: 3281

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		By way of example and without any limitation, the OIF 100G standard taught a transceiver module in which a modulated light optical signal is transmitted by Tx through a fiber output, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 9. 100G LH Framework 100G LH Module EM (modulation format independent) PEXEMBLE PRODUCT INTEGRAL INTEGRA
		OTN Framer External FEC Decoder DSP Integrated Photonics 100G LH Integrated Photonics Power, mechanical, thermal, control & electrical interface
		Figure 7. Block diagram of a transceiver module
		In further example and without limitation, the Flashwave 9500 Series and 1Finity products practice a method comprising the step of sending the modulated light as an optical signal from
		the transmitter over an optical fiber. <i>See</i> Exemplary Evidence of Infringement of Claim 1[b].
	[d] receiving the optical signals from the optical fiber at a	The Accused Instrumentalities receive optical signals from an optical fiber at a receiver of a further telecommunications box and converting the optical signals to electronic output data. The Accused Instrumentalities include a fiber input for connecting an optical fiber. By way of
	receiver of a further	example and without any limitation, the Accused Instrumentalities include an optical fiber

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 14 of 49 PageID #: 3282

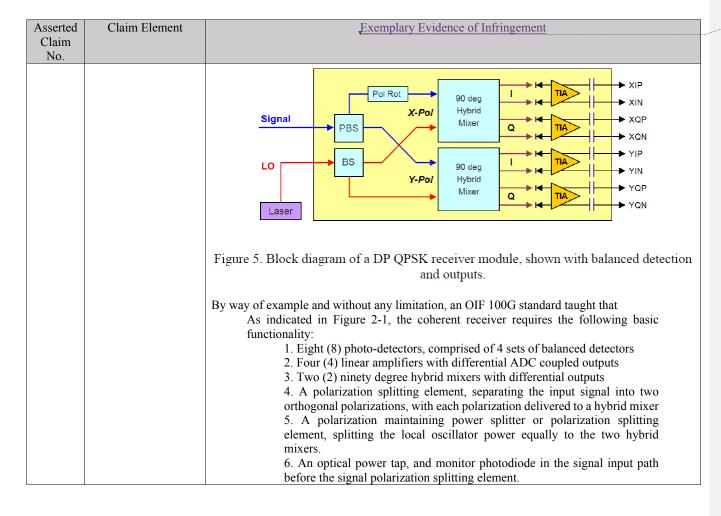
Asserted	Claim Element	Exemplary Evidence of Infringement
Claim No.		
INO.	telecommunications box and converting the optical signals to electronic output data;	interface (100G OIF 168pin Coherent Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gtrx/index.html); 100G/200G CFP2 ACO Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp2-aco/; 100G CFP Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gcfp/; 100G CFP2 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gcfp2/; 100G QSFP28 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100g-qsfp28/; 100G Optical Devices Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-100g); 100G QSFP28 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-100g; Flashwave CDS Data Sheet; Flashwave CDS Data Sheet) By way of example and without any limitation, the OIF 100G standard taught a transceiver module in which the optical signal is received by Rx through a fiber input and converted to electronic output data, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 9.





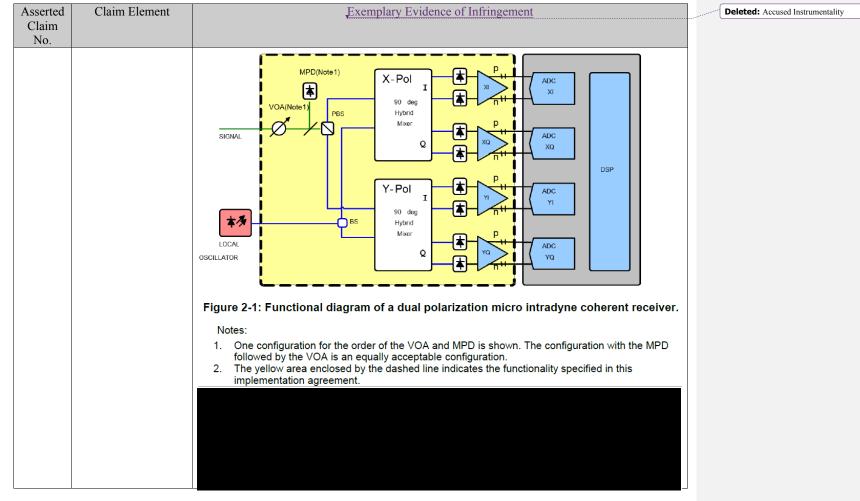
Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 17 of 49 PageID #: 3285

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		
	[e] passing the optical	The Accused Instrumentalities pass the optical signals to a photodetector to produce an electric
	signals to a	signal. As noted above, the OIF 100G standard taught a transceiver module in which the optical
	photodetector to	signal is received by Rx through a fiber input and converted to electronic output data, as
	produce an electric	depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 9.
	signal;	
		By way of example and without any limitation, the OIF 100G standard taught a receiver module
		with a number of optical components that form a demodulator, followed by optical detectors and
		transimpedance amplifiers, as shown below. See, e.g., OIF-FD-100G-DWDM-01.0 at 6.



Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 19 of 49 PageID #: 3287

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		
		7. A variable optical attenuator in the signal input path before the signal
		polarization splitting element.
		Additional required functionality for the integrated coherent receiver includes:
		 Automatic Gain Control (AGC) and/or Manual Gain Control (MGC)
		User settable output voltage swing
		 Independent output swing adjustment for each of the four outputs
		 Peak indicators for each output
		(Figure 2-1 is presented below, showing the relationship of the functionalities in addition to the
		presence of ADC and DSP). OIF-DPC-MRX-01.0-IA at 10-11.

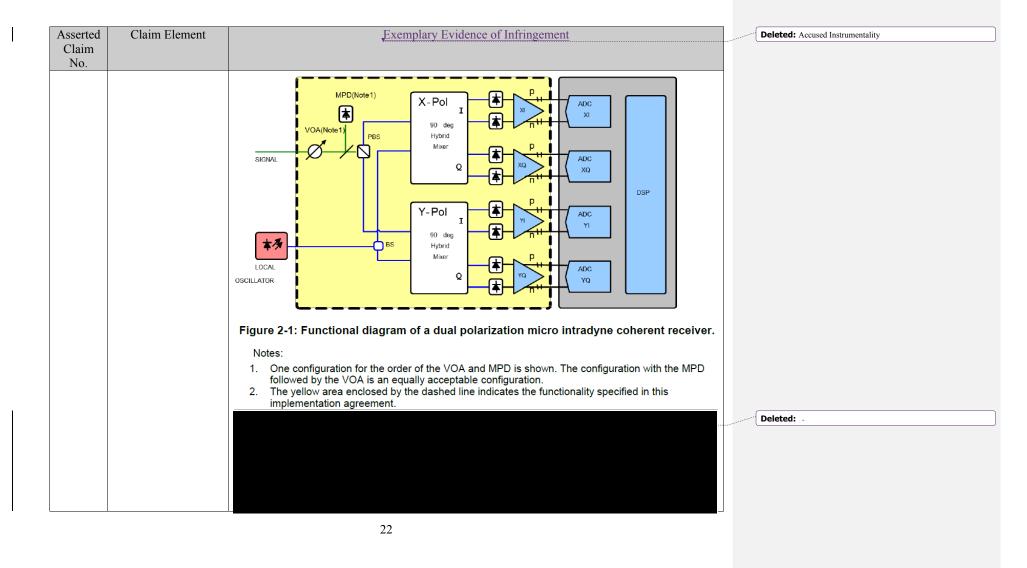


Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 21 of 49 PageID #: 3289

Asserted Claim No.	Claim Element	Exemplary Evidence of Infringement

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 22 of 49 PageID #: 3290

	eleted: Accused Instrumentality
Claim	
No.	
[f] and filtering the The Accused Instrumentalities filter the electrical signal to produce an average optical power.	
electrical signal to	
produce an average By way of example and without any limitation, an OIF 100G standard disclosed the use of a	
optical power. splitter to split the incoming optical signal to divert a portion of optical signal to the monitor	
	eleted:
photodiode is used to generate an electrical signal that is filtered to determine an average optical	
power. See, e.g., OIF-DPC-MRX-01.0-IA at 10-11; see also the figure below.	

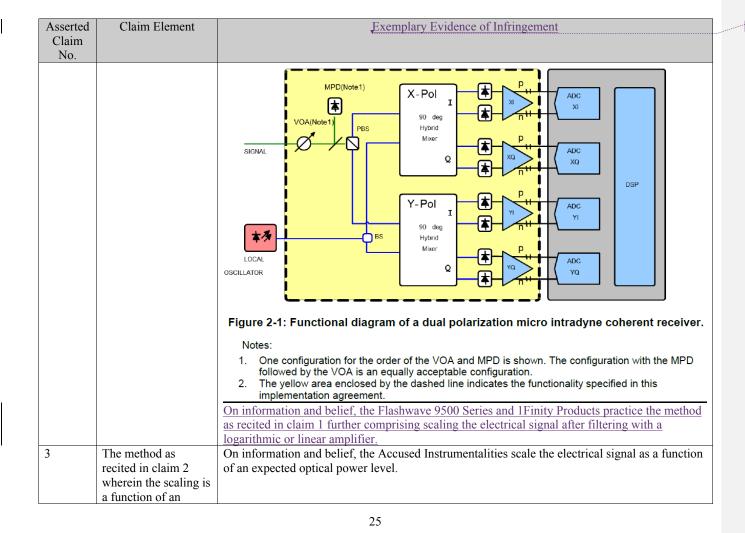


Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 24 of 49 PageID #: 3292

Asserted	Claim Element	Exemplary Evidence of Infringement	
Claim No.			
2	The method as	On information and belief, the Accused Instrumentalities scale the electrical signal after filtering	
2	recited in claim 1	with a logarithmic or linear amplifier.	
	further comprising scaling the electrical signal after filtering with a logarithmic or linear amplifier.	By way of example and without any limitation, the OIF 100G standard stated that DP QPSK receiver module contains optical detectors and amplifiers, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 6.	
	micai ampimer.	Signal PBS Pol Rot 90 deg Hybrid Mixer Q TIA XIP XIP XIN XIN XQP XQP XQN	
		BS 90 deg Hybrid Mixer YIP YQP YQP	
		Figure 5. Block diagram of a DP QPSK receiver module, shown with balanced detection and outputs.	
		By way of example and without any limitation, an OIF 100G standard taught that As indicated in Figure 2-1, the coherent receiver requires the following basic functionality: 1. Eight (8) photo-detectors, comprised of 4 sets of balanced detectors	

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 25 of 49 PageID #: 3293

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		
		2. Four (4) linear amplifiers with differential ADC coupled outputs
		3. Two (2) ninety degree hybrid mixers with differential outputs
		4. A polarization splitting element, separating the input signal into two
		orthogonal polarizations, with each polarization delivered to a hybrid mixer
		5. A polarization maintaining power splitter or polarization splitting
		element, splitting the local oscillator power equally to the two hybrid mixers.
		6. An optical power tap, and monitor photodiode in the signal input path before the signal polarization splitting element.
		7. A variable optical attenuator in the signal input path before the signal polarization splitting element.
		Additional required functionality for the integrated coherent receiver includes:
		• Automatic Gain Control (AGC) and/or Manual Gain Control (MGC)
		User settable output voltage swing
		 Independent output swing adjustment for each of the four outputs
		Peak indicators for each output
		(Figure 2-1 is presented below, showing the relationship of the functionalities in addition to the
		presence of ADC and DSP). OIF-DPC-MRX-01.0-IA at 10-11.



Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 27 of 49 PageID #: 3295

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		
140.	expected optical power level.	By way of example and without any limitation, an OIF 100G standard taught that devices should have "Alarm/Warning Threshold Registers," including an "RX Power Monitor Alarm/Warning Threshold Select." (OIF-CFP2-ACO-01.0, at 81) The the electrical signal is scaled as a function of an expected optical power level so that the alarm/warning threshold settings provide a meaningful indication of when the power is out of an acceptable range.
4	The method as	On information and belief, the Accused Instrumentalities scale the electrical signal as a function
	recited in claim 2	of a span length of the optical fiber.
	wherein the scaling is	5 5
	a function of a span	

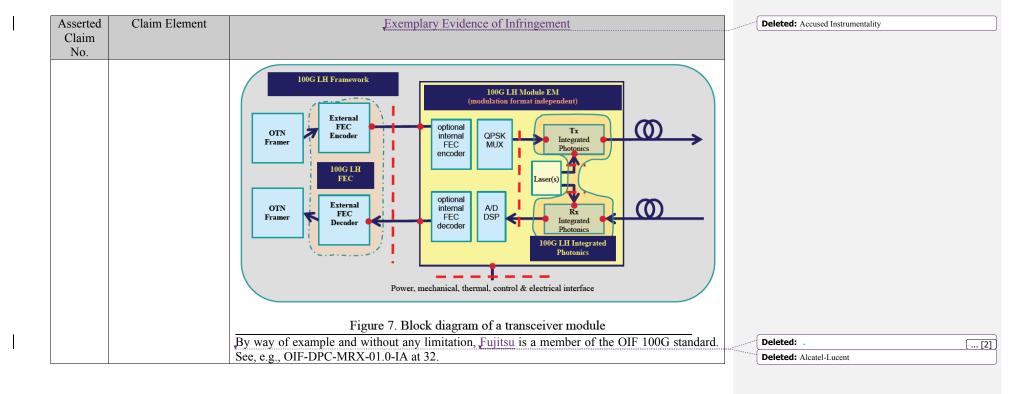
Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 28 of 49 PageID #: 3296

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim No.		
	length of the optical fiber.	By way of example and without any limitation, an OIF 100G standard taught that devices should have "Alarm/Warning Threshold Registers," including an "RX Power Monitor Alarm/Warning Threshold Select." (OIF-CFP2-ACO-01.0, at 81) The the electrical signal is scaled as a function of an expected optical power level, such as that correlating to a span length of the optical fiber. so that the alarm/warning threshold settings provide a meaningful indication of when the power is out of an acceptable range.
9	[pre] A method for operating an optical fiber multiplexor in a phase modulation mode comprising:	Fujitsu infringed Claim 1, and the claims discussed herein that directly or indirectly depend on Claim 1, by making, selling, using, offering for sale, and/or causing to be used the Accused Instrumentalities. To the extent that the preamble is considered to be a limitation, the Accused Instrumentalities comprise devices that practice a method for operating an optical fiber multiplexor. For example: the Fujitsu 1100G OIF 168pin Coherent Transceiver (FIM85200) is a transceiver card with a transmitting and receiving interface for DP-QPSK data. (100G OIF 168pin Coherent Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gtrx/index.html);
		the Fujitsu 100G CFP DCO Transceiver (FIM38000/100; FIM38100/100) is a transceiver card with a transmitting and receiving interface for DP-QPSK data. (100G CFP DCO Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp-dco/); the Fujitsu 100G/200G CFP2 ACO Transceiver (FIM38500; FIM38100) is a transceiver card with a transmitting and receiving interface for DP-QPSK data. (100G/200G CFP2 ACO Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp2-aco/);

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 29 of 49 PageID #: 3297

Asserted	Claim Element	Exemplary Evidence of Infringement	 Deleted: Accused Instrumentality
Claim			
No.			
		the Fujitsu 100G CFP Transceiver (FIM37101; FIM37102; FIM37201; FIM37102) is a	
		transceiver card with a transmitting and receiving interface for DP-QPSK data (100G CFP	
		Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-	
		modules/100gcfp/);	
		the Fujitsu 100G CFP2 Transceiver (FIM37301; FIM37302; FIM37401; FIM37402) is a transceiver card with a transmitting and receiving interface for DP-QPSK data (100G CFP2	
		Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-	
		modules/100gcfp2/);	
		the Fujitsu 100G QSFP28 Transceiver (FIM37700; FIM37800) is a transceiver card with a	
		transmitting and receiving interface for DP-QPSK data (100G QSFP28 Transceiver Product	
		Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100g-qsfp28/);	
		the Fujitsu 100G/400G LN Modulator (FTM7992HM; FTM7990HKA; FTM7977HQA) is a	
		transceiver card with a transmitting and receiving interface for DP-QPSK data (100G Optical	
		Devices Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-	
		100g);	
		the Fujitsu 100G/400G Integrated Coherent Receiver (FIM24901; FIM24721) is a component of	
		a transceiver with receiving interface for DP-QPSK data (100G QSFP28 Transceiver Product	
		Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-100g);	
		the Fujitsu HD62 OTN Switch Aggregator Unit is a transceiver card with a transmitting and	
		receiving interface for DP-QPSK data (Flashwave CDS Data Sheet);	
		the Fujitsu TM61 OTU4 OTN Transponder Demarcation Unit is a transceiver card with a	
		transmitting and receiving interface for DP-QPSK data (Flashwave CDS Data Sheet); and	
		the Fujitsu Flashwave 7420 WDM Platform a transceiver card with a transmitting and receiving	
		interface for DP-QPSK data (Flashwave 7420 Data Sheet)	
		By way of example and without any limitation, the OIF 100G standard taught a transceiver	 Deleted:
		module, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 8-9 ("All the blocks	
		illustrated are contained on a single printed circuit board. The large block on the right represents	
		the 100G transceiver module – electro mechanicals. As discussed above this OIF project	
		addresses physical aspects of this module and the electrical data and control interfaces to it.").	
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Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 30 of 49 PageID #: 3298



Asserted	Claim Element	Ex	emplary Evidence of Infringen	<u>nent</u>
Claim				
No.				
		12 Appendix C: List o	f companies belonging	to the OIF at approval
		date	1 0 0	11
		uate		
		Acacia Communications	Fujikura	NeoPhotonics
		ADVA Optical Networking	Fujitsu	NTT Corporation
		Alcatel-Lucent	Furukawa Electric Japan	Oclaro
		Altera	Google	Orange
		AMCC	Hewlett Packard	PacketPhotonics
		Amphenol Corp.	Hitachi	PETRA
		Analog Devices	Huawei Technologies	Picometrix
		Anritsu	IBM Corporation	PMC Sierra
		Applied Communication Sciences	Infinera	QLogic Corporation
		Avago Technologies Inc.	Inphi	Qorvo
		Broadcom	Intel	Ranovus
		Brocade	Ixia	Rockley Photonics
		BRPhotonics	JDSU	Samtec Inc.
		BTI Systems	Juniper Networks	Semtech
		China Telecom	Kaiam	Spirent Communications
		Ciena Corporation	Kandou	Sumitomo Electric Industries
		Cisco Systems	KDDI R&D Laboratories	Sumitomo Osaka Cement
		ClariPhy Communications	Keysight Technologies, Inc.	TE Connectivity
		Coriant R&G GmbH	LeCroy	Tektronix
		CPqD	Luxtera	TELUS Communications, Inc.
		Deutsche Telekom	M/A-COM Technology Solutions	TeraXion
		Dove Networking Solutions	Mellanox Technologies	Texas Instruments
		EMC Corp	Microsemi Inc.	Time Warner Cable
		Emcore	Microsoft Corporation	US Conec
		Ericsson	Mitsubishi Electric Corporation	Verizon
		ETRI	Molex	Xilinx
		FCI USA LLC	MoSys, Inc.	Yamaichi Electronics Ltd.
		Fiberhome Technologies Group	MultiPhy Ltd	ZTE Corporation
		Finisar Corporation	NEC	

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 32 of 49 PageID #: 3300

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		
	[-] C 1: :	
	[a] feeding input data	The Accused Instrumentalities feed input data to a controller of a transmitter of a
	to a controller of a	telecommunications box, the telecommunications box having an electronic data input for the
	transmitter of a	input data and an electronic data output.

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 33 of 49 PageID #: 3301

Asserted	Claim Element	Exemplary Evidence of Infringement	Deleted: Accused Instrumentality
Claim			
No.			
	telecommunications		
	box, the	By way of example and without any limitation, the OIF 100G standard taught that the "signal	
	telecommunications	[framed incoming data] then passes to the transceiver module. Data is converted to drive signals	
	box having an	to control the optical modulators. A transmit laser provides the light source for the modulators.	
	electronic data input	On the receive side the incoming signal is mixed with a local oscillator, demodulated into	
	for the input data and	components, detected, amplified, digitized, then passed into the DSP module." OIF-FD-100G-	
	an electronic data	DWDM-01.0 at 9 (see figure below).	
	output;	100G LH Framework Tomodulation format independent) External FEC Encoder FEC Encoder FEC Decoder Photonics Power, mechanical, thermal, control & electrical interface	
		Figure 7. Disability and for the second section we had	
		Figure 7. Block diagram of a transceiver module	<u></u>
		By way of example and without any limitation, Fujitsu's Flashwave 9500 Series products and 1Finity products comprise a method for feeding input data to a controller of a transmitter of a	Deleted: .
		telecommunications box, the telecommunications box having an electronic data input for the	
		input data and an electronic data output. See, e.g., Exemplary Evidence of Infringement of	
		mp at the same and the state of the same o	
		32	

b] using the	Claim 1[a].
ontroller, controlling modulator to phase nodulate light from a user as a function of the input data;	The Accused Instrumentalities use the controller to control a modulator to modulate light from a laser as a function of the input data. By way of example and without any limitation, the OIF 100G standard taught that the "signal [framed incoming data] then passes to the transceiver module. Data is converted to drive signals to control the optical modulators. A transmit laser provides the light source for the modulators. On the receive side the incoming signal is mixed with a local oscillator, demodulated into components, detected, amplified, digitized, then passed into the DSP module." OIF-FD-100G-DWDM-01.0 at 9 (see figure below). 100G LH Framework (modulation format independent) 100G LH Module EM (modulation format independent) 100G LH Framework (modulation format independent) 100G LH Framework (modulation format independent) 100G LH Module EM (modulation format independent) 100G LH Framework (modulation format independent)
	Figure 7. Block diagram of a transceiver module
ıs	odulate light from a er as a function of

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim		
No.		By way of example and without any limitation, the OIF 100G standard taught a transmitter module which includes a laser, modulators that modulate phase of the light, drivers, including other components that are not represented, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 5-6. Driver 1 Modulator 2 Modulator 3 Modulator 3 Modulator 4 Driver 4
		* Optional RZ Carver
	[a] and and b	Figure 4. Block diagram of a DP QPSK transmitter module By way of example and without any limitation, Fujitsu's Flashwave 9500 Series products and 1Finity products comprise a method for using the controller, controlling a modulator to phase modulate light from a laser as a function of the input data. See, e.g., Exemplary Evidence of Infringement of Claim 1[b].
	[c] sending the modulated light as an optical signal from the transmitter over an optical fiber;	The Accused Instrumentalities send modulated light as an optical signal from the transmitter over an optical fiber. The Accused Instrumentalities include a fiber output optically connected to an optical fiber to the card. By way of example and without any limitation, the Accused Instrumentalities include an optical fiber interface (100G OIF 168pin Coherent Transceiver

34

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 36 of 49 PageID #: 3304

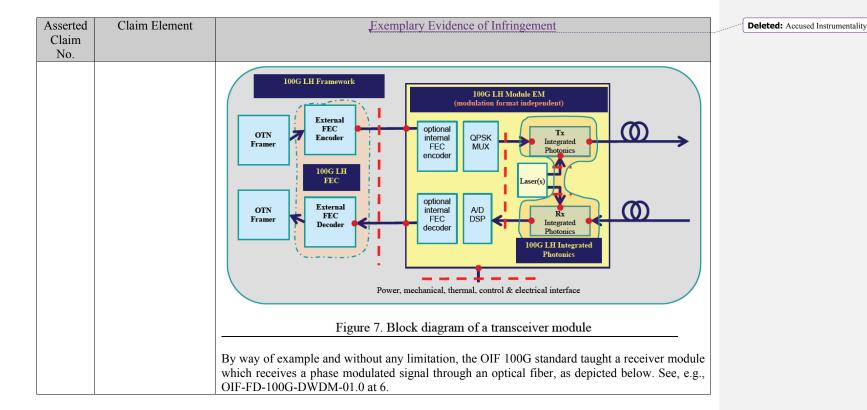
Asserted	Claim Element	Exemplary Evidence of Infringement
Claim No.		
		Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gtrx/index.html); 100G/200G CFP2 ACO Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp2-aco/; 100G CFP Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gcfp/; 100G CFP2 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gcfp2/; 100G QSFP28 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100g-qsfp28/; 100G Optical Devices Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-100g); 100G QSFP28 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-100g; Flashwave CDS Data Sheet; Flashwave 7420 Data Sheet)
		By way of example and without any limitation, the OIF 100G standard taught a transceiver module in which a modulated light optical signal is transmitted by Tx through a fiber output, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 9.

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 37 of 49 PageID #: 3305

Asserted	Claim Element	Exemplary Evidence of Infringement	Deleted: Accused Instrumentality
Claim			
No.			
		OTN Framer External FEC Decoder Power, mechanical, thermal, control & electrical interface	
		Figure 7. Block diagram of a transceiver module	
		By way of example and without any limitation, Fujitsu's Flashwave 9500 Series products and	Deleted: .
		1Finity products comprise a method for sending the modulated light as an optical signal from the transmitter over an optical fiber. <i>See, e.g.</i> , Exemplary Evidence of Infringement of Claim	
		1[c].	
	[d] receiving the	The Accused Instrumentalities receive optical signals from an optical fiber at a receiver of a	
	optical signals from	further telecommunications box and converting the optical signals to electronic output data. The	
	the optical fiber at a	Accused Instrumentalities include a fiber input for connecting an optical fiber. By way of	
	receiver of a further	example and without any limitation, the Accused Instrumentalities include an optical fiber	
	telecommunications	interface (100G OIF 168pin Coherent Transceiver Product Page,	
	box and converting the optical signals to	http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100gtrx/index.html);	

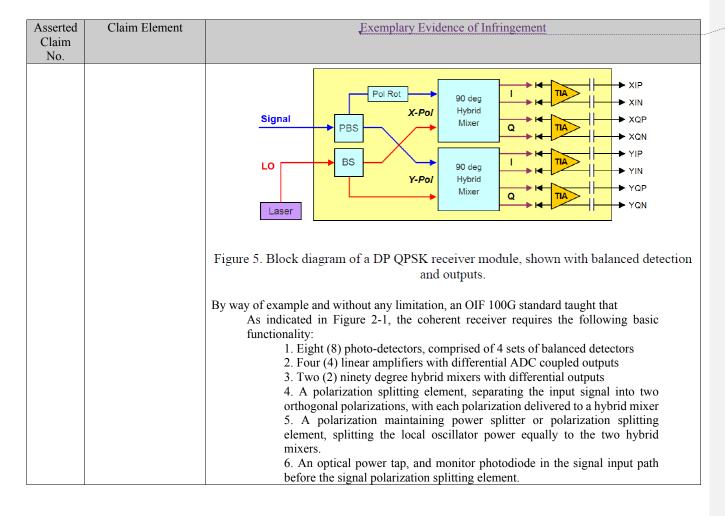
Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 38 of 49 PageID #: 3306

Asserted	Claim Element	Exemplary Evidence of Infringement		
Claim				
No.				
	electronic output	100G/200G CFP2 ACO Transceiver Product Page,		
	data;	http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/cfp2-aco/;		
		100G CFP Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-		
		modules/100gcfp/;		
		100G CFP2 Transceiver Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-		
		modules/100gcfp2/;		
		100G QSFP28 Transceiver Product Page,		
		http://www.fujitsu.com/jp/group/foc/en/products/optical-modules/100g-qsfp28/;		
		100G Optical Devices Product Page, http://www.fujitsu.com/jp/group/foc/en/products/optical-		
		devices/#ln-100g);		
		100G QSFP28 Transceiver Product Page,		
		http://www.fujitsu.com/jp/group/foc/en/products/optical-devices/#ln-100g;		
		Flashwave CDS Data Sheet;		
		Flashwave 7420 Data Sheet)		
		By way of example and without any limitation, the OIF 100G standard taught a transceiver		
		module in which the optical signal is received by Rx through a fiber input and converted to		
		electronic output data, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 9.		



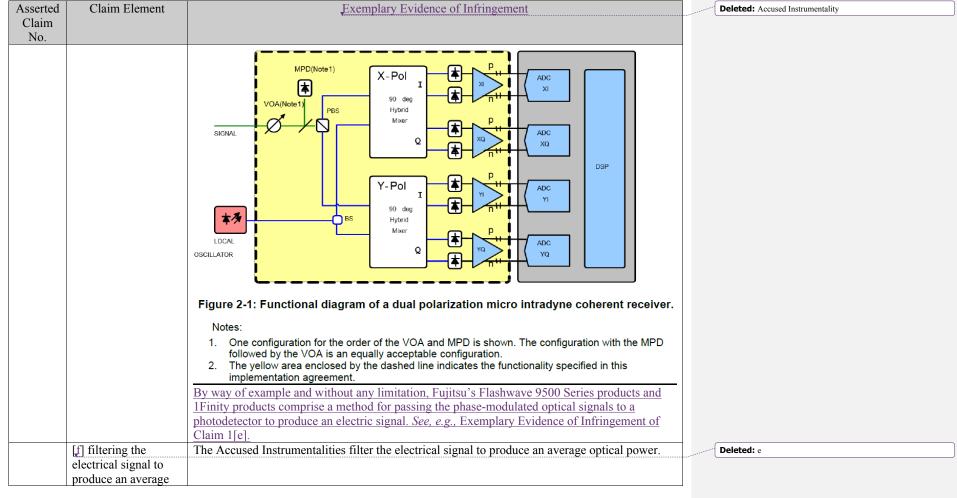
Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 40 of 49 PageID #: 3308

Asserted	Claim Element	Exemplary Evidence of Infringement		
Claim				
No.				
		Signal PBS Pol Rot PBS Pol Rot Y-Pol Mixer PBS Pol Rot Y-Pol Mixer PBS Pol Rot Y-Pol Mixer PBS Y-Pol Mixer Y-Pol Mixer Y-Pol Mixer Y-Pol Mixer Y-Pol Mixer Y-Pol Y-Pol Mixer Y-Pol Y-P		
		Figure 5. Block diagram of a DP QPSK receiver module, shown with balanced detection and outputs.		
		By way of example and without any limitation, Fujitsu's Flashwave 9500 Series products and		
		1Finity products comprise a method for receiving the optical signals from the optical fiber at a		
		receiver of a further telecommunications box and converting the optical signals to electronic		
		output data. See, e.g., Exemplary Evidence of Infringement of Claim 1[d].		
	[e] passing the phase-	The Accused Instrumentalities pass the optical signals to a photodetector to produce an electric		
	modulated optical	signal. As noted above, the OIF 100G standard taught a transceiver module in which the optical		
	signals to a	signal is received by Rx through a fiber input and converted to electronic output data, as		
	photodetector to	depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 9.		
	produce an electric			
	signal; and	By way of example and without any limitation, the OIF 100G standard taught a receiver module		
		with a number of optical components that form a demodulator, followed by optical detectors and transimpedance amplifiers, as shown below. See, e.g., OIF-FD-100G-DWDM-01.0 at 6.		



Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 42 of 49 PageID #: 3310

Asserted	Claim Element	Exemplary Evidence of Infringement	
Claim			
No.			
		7. A variable optical attenuator in the signal input path before the signal	
		polarization splitting element.	
		Additional required functionality for the integrated coherent receiver includes:	
		 Automatic Gain Control (AGC) and/or Manual Gain Control (MGC) 	
		User settable output voltage swing	
		 Independent output swing adjustment for each of the four outputs 	
		Peak indicators for each output	
		(Figure 2-1 is presented below, showing the relationship of the functionalities in addition to the	
		presence of ADC and DSP). OIF-DPC-MRX-01.0-IA at 10-11.	



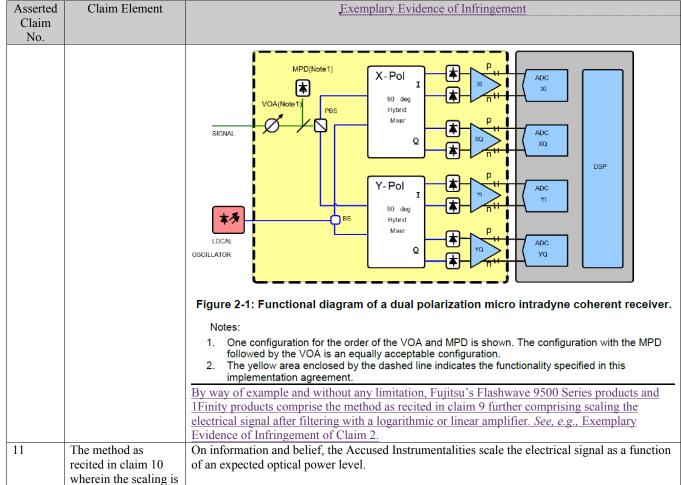
Asserted	Claim Element	Exemplary Evidence of Infringement Delete	d: Accused Instrumentality
Claim			
No.			
	optical power.	By way of example and without any limitation, an OIF 100G standard disclosed the use of a splitter to split the incoming optical signal to divert a portion of optical signal to the monitor photodiode as the optical signal is received by the receiver for demodulation. The monitor photodiode is used to generate an electrical signal that is filtered to determine an average optical power. See, e.g., OIF-DPC-MRX-01.0-IA at 10-11; see also the figure below. ADC	
		Notes:	
		One configuration for the order of the VOA and MPD is shown. The configuration with the MPD followed by the VOA is an equally acceptable configuration.	
		The yellow area enclosed by the dashed line indicates the functionality specified in this	
		implementation agreement.	
		By way of example and without any limitation, Fujitsu's Flashwave 9500 Series products and	d: .
		1Finity products comprise a method for filtering the electrical signal to produce an average	

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 45 of 49 PageID #: 3313

Asserted	Claim Element	Exemplary Evidence of Infringement		
Claim				
No.		' 1 G D 1 D'1 OIC' (COL' 150)		
10	771 (1 1	optical power. See, e.g., Exemplary Evidence of Infringement of Claim 1[f].		
10	The method as recited in claim 9 further comprising	On information and belief, the Accused Instrumentalities scale the electrical signal after filtering with a logarithmic or linear amplifier.		
	scaling the electrical signal after filtering with a logarithmic or linear amplifier.	By way of example and without any limitation, the OIF 100G standard stated that DP QPSK receiver module contains optical detectors and amplifiers, as depicted below. See, e.g., OIF-FD-100G-DWDM-01.0 at 6.		
	linear amplifier.	Figure 5. Block diagram of a DP QPSK receiver module, shown with balanced detection and outputs. By way of example and without any limitation, an OIF 100G standard taught that As indicated in Figure 2-1, the coherent receiver requires the following basic functionality: 1. Eight (8) photo-detectors, comprised of 4 sets of balanced detectors 2. Four (4) linear amplifiers with differential ADC coupled outputs 3. Two (2) ninety degree hybrid mixers with differential outputs		

Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 46 of 49 PageID #: 3314

Asserted	Claim Element	Exemplary Evidence of Infringement	
Claim			
No.			
		4. A polarization splitting element, separating the input signal into two	
		orthogonal polarizations, with each polarization delivered to a hybrid mixer	
		5. A polarization maintaining power splitter or polarization splitting	
		element, splitting the local oscillator power equally to the two hybrid mixers.	
		6. An optical power tap, and monitor photodiode in the signal input path before the signal polarization splitting element.	
		7. A variable optical attenuator in the signal input path before the signal polarization splitting element.	
		Additional required functionality for the integrated coherent receiver includes:	
		 Automatic Gain Control (AGC) and/or Manual Gain Control (MGC) 	
		User settable output voltage swing	
		 Independent output swing adjustment for each of the four outputs 	
		Peak indicators for each output	
		(Figure 2-1 is presented below, showing the relationship of the functionalities in addition to the	
		presence of ADC and DSP). OIF-DPC-MRX-01.0-IA at 10-11.	



Case 2:16-cv-01302-JRG Document 193-2 Filed 12/06/17 Page 48 of 49 PageID #: 3316

Asserted	Claim Element	Exemplary Evidence of Infringement
Claim No.		
110.	a function of an expected optical power level.	By way of example and without any limitation, an OIF 100G standard taught that devices should have "Alarm/Warning Threshold Registers," including an "RX Power Monitor Alarm/Warning Threshold Select." (OIF-CFP2-ACO-01.0, at 81) The the electrical signal is scaled as a function of an expected optical power level so that the alarm/warning threshold settings provide a meaningful indication of when the power is out of an acceptable range. By way of example and without any limitation, Fujitsu's Flashwave 9500 Series products and 1Finity products comprise the method as recited in claim 10 wherein the scaling is a function of
		an expected optical power level. See, e.g., Exemplary Evidence of Infringement of Claim 3.
12	The method as recited in claim 10 wherein the scaling is	On information and belief, the Accused Instrumentalities scale the electrical signal as a function of a span length of the optical fiber.
	a function of a span length of the optical fiber.	By way of example and without any limitation, an OIF 100G standard taught that devices should have "Alarm/Warning Threshold Registers," including an "RX Power Monitor Alarm/Warning Threshold Select." (OIF-CFP2-ACO-01.0, at 81) The the electrical signal is scaled as a function of an expected optical power level, such as that correlating to a span length of the optical fiber. so that the alarm/warning threshold settings provide a meaningful indication of when the power is out of an acceptable range.
		By way of example and without any limitation, Fujitsu's Flashwave 9500 Series products and 1Finity products comprise the method as recited in claim 10 wherein the scaling is a function of a span length of the optical fiber. <i>See, e.g.,</i> Exemplary Evidence of Infringement of Claim 4.

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Page 29: [2] Deleted	Arka Chatterjee	12/4/17 1:56:00 PM